

from: PeterToren <ptoren@petertoren.com>
to: "Kessler, Thomas" <tkessler@cgsh.com>,
Jim Li <lij@lilaw.us>,
Jennifer Bennett <jennifer@guptawessler.com>,
Stevie Glaberson <sglaberson@publicjustice.net>
cc: "Park, Jennifer Kennedy" <jpark@cgsh.com>

date: Sep 21, 2020, 10:57 AM
subject: AAI
Tom,

I am following up on my emails from last week.
It should take only a matter of minutes to forward emails to intervenors with attachments. As you know, we must prepare the response today to meet the deadline under the Court's order. If we do not hear from you by 2pm today, we will have to assume that Defendants refused Plaintiff's repeated requests,
Sincerely,

Peter

On Sat, Sep 19, 2020 at 10:28 AM Peter Toren <ptoren@petertoren.com> wrote:
Tom,

We are requesting that Defendants provide us with all of their emails sent to Intervenor post-August 4, 2020 which attached documents. Defendants should have provided Plaintiff with these emails to the extent that should emails exist, but apparently did not do so. Please forward these emails to us immediately. This should not take long.

These emails will confirm that all the documents approved by Plaintiff have been indeed provided to Intervenor.

Thanks,

Peter

On Fri, Sep 18, 2020 at 9:23 PM Kessler, Thomas <tkessler@cgsh.com> wrote:
Peter,

To the extent your email implies that Defendants provided any documents to the Proposed Intervenor that were not expressly approved by Plaintiff, rest assured that is not the case. Your client already has every document we have provided to the Proposed Intervenor, in the form provided. Is there something else you are looking for?

Regards,

Tom

Thomas S. Kessler

Cleary Gottlieb Steen & Hamilton LLP

Assistant: asewer@cgsh.com

One Liberty Plaza, New York NY 10006

T: [+1 212 225 2884](tel:+12122252884)

tkessler@cgsh.com | clearygottlieb.com

Pronouns: he/him/his

On Sep 18, 2020, at 9:09 PM, Peter Toren <ptoren@petertoren.com> wrote:

Jennifer and Stevie,

Please forward to me all of Defendants' email(s) after August 4, 2020, that attached any of the documents that Defendants provided to you/the Intervenors. Plaintiff has the right to receive all of these documents.

Your response overlooked this simple request. Please do so immediately,

Thanks,

Peter

--

Member - N.Y., CA, D.C. Bars

(646) 623-4654

ptoren@petertoren.com